

UNITED STATES DISTRICT COURT

CLERK'S OFFICE U.S. DISTRICT COURT
AT ABINGDON, VA
FILED

for the

Western District of Virginia

AUG 15 2024

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)TODD STEWART WILLIAMS IN RELATION TO
BIOMETRIC DATA

Case No. 1:24 mj 56

LAURA A. AUSTIN, CLERK
BY: R. Campbell
DEPUTY CLERK

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Western District of Virginia, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

18 U.S.C. § 2251

Sexual exploitation of children

The application is based on these facts:

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

FBI Special Agent Lindsey Rosson

Printed name and title

Sworn to before me and signed in my presence.

Date:

8/15/24

City and state: Abingdon, Virginia



Judge's signature

Pamela Meade Sargent, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

CLERK'S OFFICE U.S. DISTRICT COURT
AT ABINGDON, VA
FILED

AUG 15 2024

LAURA A. AUSTIN, CLERK
BY: R. Colucci
DEPUTY CLERK

**IN THE MATTER OF THE
SEARCH OF:**

No. 1:24 mj 56
Filed Under Seal

**TODD STEWART WILLIAMS IN
RELATION TO BIOMETRIC DATA**

**AFFIDAVIT IN SUPPORT OF AN APPLICATION UNDER RULE 41
FOR A WARRANT TO SEARCH AND SEIZE**

1. I, Lindsey Rosson, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

2. Through separate applications, I am seeking warrant authorization to search 1010 Old Stage Road in Chilhowie, Virginia and the person of TODD STEWART WILLIAMS. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure to obtain from TODD STEWART WILLIAMS the display of physical biometric characteristics (such as fingerprint, thumbprint, or facial characteristics) in order to unlock devices subject to search and seizure under those separate warrants.

3. I am a Special Agent with the Federal Bureau of Investigation ("FBI") assigned to the FBI's Richmond Division, Bristol Resident Agency. I have been a Special Agent with the FBI since August 1, 2021. I have received training in

federal law, interviewing and interrogation techniques, physical surveillance, tactics, firearms, search and seizure procedures, and arrest procedures at the FBI Academy in Quantico, VA.

4. I have experience with cases involving the following crimes: crimes against children, conspiracy, financial crimes, and other violations of Title 18 of the United States Code. I also have experience utilizing the following investigative techniques and procedures: interviewing suspects, victims, and witness; identification and collection of computer-related evidence; search warrants for online accounts and electronically stored information; and executing arrest warrants. In addition to my basic law-enforcement training at the FBI Academy, I have also received training in the following areas: financial investigations; criminal use of email, social media, and telephonic communications; Title III wire interceptions; and forensic search procedures as a member of FBI Richmond Division's Evidence Response Team.

5. I am an "investigative or law enforcement officer" within the meaning of 18 U.S.C. § 2510; that is, an officer of the United States of America who is empowered to investigate and make arrests for offenses alleged in this warrant. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based upon my personal observations, my

training and experience, and information obtained from various law enforcement personnel and witnesses. I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary for the limited purpose of establishing probable cause for the requested arrest warrant. The assertions in this affidavit are true to the best of my knowledge and belief.

6. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 2251 have been committed by TODD STEWART WILLIAMS by his employing, using, persuading, inducing, enticing, or coercing multiple minors to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.

7. The warrant I am applying for would permit law enforcement to obtain from WILLIAMS the display of physical biometric characteristics (such as fingerprint, thumbprint, or facial characteristics) in order to “unlock” devices subject to search and seizure.

8. Unless otherwise indicated, wherever in this affidavit I assert that an individual made a statement, that statement is described in substance herein and is

not intended to be a verbatim recitation of such statement. The following is true to the best of my knowledge and belief.

STATUTORY AUTHORITY

9. Section 2251 of Title 18 states: “Any person who employs, uses, persuades, induces, entices, or coerces any minor to engage in, or who has a minor assist any other person to engage in, or who transports any minor in or affecting interstate or foreign commerce, or in any Territory or Possession of the United States, with the intent that such minor engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, shall be punished as provided under subsection (e), if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed.”

TECHNICAL TERMS

10. Based on my training and experience, and information acquired from other law enforcement officials with technical expertise, I know the terms described below have the following meanings or characteristics:

11. The term “Internet” is a worldwide network of computers, a noncommercial, self-governing network devoted mostly to communication and research. The Internet is not an online service and has no real central hub. It is a collection of numerous computer networks, online services, and single-user components. To access the Internet, an individual computer user generally must use an access provider, such as a university, employer, or commercial Internet Service Provider (“ISP”), which operates a host computer with direct access to the Internet.

12. The term “ISP,” as used herein, are commercial organizations that are in business to provide individuals and businesses access to the Internet. ISPs provide a range of functions for their customers including access to the Internet, web hosting, e-mail, remote storage, and co-location of computers and other communications equipment.

13. An Internet Protocol address (“IP address”) is a unique numeric address used by computers on the Internet. An IP Address is a series of four numbers, each in the range 0–255, separated by periods (e.g., 121.56.97.178).

Every computer attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. An IP address acts much like a home or business street address—it enables computers connected to the Internet to properly route traffic to each other. The assignment of IP addresses to computers connected to the Internet is controlled by ISPs.

14. “Chat,” as used herein, refers to any kind of text communication over the Internet that is transmitted in real time from sender to receiver. Chat messages are generally short, in order to enable other participants to respond quickly and in a format that resembles an oral conversation. This feature distinguishes chatting from other text-based online communications such as Internet forums and email.

15. “Child pornography,” as defined in 18 U.S.C. § 2256(8), is any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or

modified to appear that an identifiable minor is engaged in sexually explicit conduct.

16. “Computer,” as used herein, refers to “an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device” and includes smartphones, other mobile phones, and other mobile devices. *See* 18 U.S.C. §§ 2256(6), 1030(e)(1).

17. “Minor,” as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.

18. “Sexually explicit conduct,” as defined in 18 U.S.C. § 2256(2), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the anus, genitals, or pubic area of any person.

19. “Visual depiction,” as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

BACKGROUND REGARDING SNAPCHAT

20. Snapchat is a product offered by Snap Inc., which is a company headquartered in Santa Monica, California. Snapchat is a free-access social networking application (or “app”) that can be accessed at <http://www.snapchat.com>. Snapchat is an application for sending and receiving “self-destructing” messages, pictures, and videos. These messages are commonly referred to as “snaps.”

21. A “snap” is a picture or video message taken and shared with other Snapchat users in real-time. The sender of a snap has the option of setting a timer for how long their snap can be viewed. Generally speaking, once a snap has been viewed, it is deleted from Snap’s system and is no longer visible to the recipient.

22. Snapchat users can also send text messages to others using Snapchat’s “Chat” feature. Once a user leaves the Chat screen within the application, messages viewed by both the sender and the receiver will exist for only a predetermined amount of time. Then the Snap system deletes the messages. Snapchat further notifies other users when a user is online, and users can begin messaging each other. In addition, Snapchat users can send pictures to other users by utilizing the camera on their device. Pictures can also be sent from an archive of saved pictures in the photo gallery of the device. Snapchat users compile contact lists of other users with whom they can communicate.

23. A Snapchat username is a unique identifier associated with a specific account on Snapchat and cannot be changed by the user. On the other hand, a Snapchat vanity name is not a unique identifier and can be set and changed by a user or that user's friends to indicate how the user will appear within the app. Unlike a username, a vanity name can contain special characters and symbols beyond hyphen, underscore, or period, as well as spaces, emojis, and capital letters.

24. While a Snapchat message or "snap" may disappear, the record of who sent it and when still exists. Snapchat records and retains information that is roughly analogous to the call-detail records maintained by telecommunications companies. This includes the date, time, sender, and recipient of a snap or message. Additionally, Snapchat stores the number of messages exchanged, which users they communicate with the most, message status including whether and when the message was opened, and whether the receiver used the native screen-capture function of their device to take a picture of the snap before it disappeared.

25. Snapchat asks users to provide basic contact and personal identifying information to include date of birth. When a user creates an account, they make a unique Snapchat username. This is the name visible to other Snapchat users. An email address is required to register a Snapchat account, and a new user must also provide a mobile phone number. This phone number is verified during the

registration process. Snapchat sends an activation code that must be entered before proceeding with the registration step. However, a user may elect to bypass entering a phone number so one may not always be present in the user's account. Snapchat also retains the account-creation date.

26. Snapchat stores device information such as the model, operating system, operating system version, mobile device phone number, and mobile network information of devices used in conjunction with the service. They also collect unique device identifiers such as the Media Access Control (MAC) address and the International Mobile Equipment Identifier (IMEI) or Mobile Equipment Identifier (MEID) of devices used to access Snapchat. In the event the Snapchat user's application crashes, the company also collects a list of other installed applications on the device to detect any potential software conflicts.

27. In addition, application providers often have records of the IP addresses used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help identify which computers or other devices were used to access the account and the geographic location where such computers were used.

BACKGROUND REGARDING TELEGRAM

28. Telegram provides cloud-based messaging service that allows users to exchange messages and photos, videos, and files. The Russian developers of Telegram originally designed the product in support of providing a means of communication that could not be accessed by the Russian Security Agencies. Telegram is not required to cooperate with law enforcement agencies in the United States and does not respond to legal process from the United States.

29. Telegram can be accessed by downloading the application for iOS or Android devices, or accessed via web application. Telegram allows users to register by providing a telephone number that can receive SMS text messages and a username created by the account holder. Telegram does not require any personally identifying information. Only the username is shared with contacts. Contact usernames do not have to reside on the device contact list in order to initiate chats. Telegram allows users to send messages and any type of file with no size limitation. Messages and files can be set to self-destruct after a certain period.

30. Based on my training and experience, Telegram is a popular application for individuals engaging in criminal activity, including the production and distribution of child pornography, as law enforcement is unable to serve legal process to Telegram for account subscriber information or content.

BACKGROUND REGARDING CASH APP

31. Cash App is a mobile payment service run by Block, Inc. that allows users to create unique usernames called “cashtags” to send, receive, and store money using a mobile phone application. Users can transfer money into or out of Cash App through linked bank accounts. Users can also obtain a Cash App Card, which is a debit card that allows users to spend money in Cash App at various retailers and withdraw cash from an ATM.

32. To send and receive funds without amount limits, users must provide their legal name, date of birth and the last 4 digits of their Social Security number. In addition to peer-to-peer transactions, Cash App also offers direct deposits, a savings account, a debit card, investing in stocks and Bitcoin, a tax-filing service, and personal loans.

BACKGROUND REGARDING PAYPAL

33. PayPal is an online payment system run by PayPal Holdings, Inc. that allows users around the globe to make financial transactions between individuals and businesses. Users can sign up for a personal or business account that can be accessed via mobile phone application or website.

34. To sign up for a personal account, users must provide their first and last name, address, telephone number, and email address. For personal accounts, PayPal offers money transfers, debit and credit cards, check cashing, e-check

services, and a savings account. Users can also use PayPal to shop online and in-store.

FACTS ESTABLISHING PROBABLE CAUSE

35. In September 2022, Juvenile Victim 1 (“JV1”) reported to the FBI Oklahoma City Division that Todd WILLIAMS requested and received nude images and videos of JV1 via Snapchat account todd_w3441 (“todd_w3441”).

36. JV1 was identified as a victim in an unrelated FBI Jackson, Mississippi investigation regarding the sexual exploitation of minors. FBI Oklahoma City was asked to locate and interview JV1 for the purposes of that investigation. On or about September 6, 2022, before FBI Oklahoma City conducted a Child/Adolescent Forensic Interview (“CAF Interview”) with JV1, JV1 provided the following information:

- a. JV1 is a member of a Snapchat group for homosexual teenage males. JV1 communicated with multiple individuals within the group. If JV1 or other group members realized an individual they were communicating with was not a teenage boy, JV1 or other members of the group would “out” the Snapchat user on the group chat forum.
- b. JV1 identified the user of the todd_w3441 as an adult male to whom JV1 provided nude images in exchange for money.

- c. After speaking with FBI Oklahoma City, JV1 became motivated to help the FBI and provide more information. JVI told the Oklahoma City FBI agent that JV1 wanted to be a police officer when he got older.

37. In a CAF Interview conducted on September 27, 2022, JV1 provided the following information:

- a. In early summer 2022, todd_w3441 added JV1 as a contact on Snapchat, began messaging JV1, and asked JV1 to provide JV1's age. JV1 told todd_w3441 that JV1 was 15 years old (which was true). Todd_w3441 then told JV1 that todd_w3441 was 37 years old. Todd_w3441 told JV1 that todd_w3441's name was Todd WILLIAMS.
- b. JV1 likes to play Fortnite. JV1 had posted a message on Snapchat asking for someone to purchase something related to Fortnite for JV1. WILLIAMS offered to purchase the item for JV1. JV1 agreed, and WILLIAMS sent JV1 money from Cash App username \$ToddsWill.
- c. WILLIAMS asked JV1 to send nude images of JV1 to WILLIAMS on Snapchat account todd_w3441 in exchange for more money. JV1 sent WILLIAMS images and videos of JV1 in the shower to todd_w3441. JV1 did not save the images. WILLIAMS sent JV1 images of his penis from todd_w3441. WILLIAMS would send JV1 the pictures of his

penis in the morning when he was “excited.” JV1 did not save the images.

- d. \$Toddswill sent JV1 money in amounts ranging from \$20.00 to \$50.00 on Cash App in exchange for JV1 sending nude images and videos of JV1 to todd_w3441 for approximately 3 months. \$Toddswill also sent JV1 money to use to travel to meet WILLIAMS in person and have sex. WILLIAMS told JV1 he would let JV1 live with him. (Based on my investigation to date, JV1 did not have physical sexual contact with WILLIAMS.)
- e. Todd_w3441 told JV1 WILLIAMS was an eighth-grade basketball coach in Chilhowie, Virginia. In the background of one of the images todd_w3441 sent to JV1, JV1 noticed a logo. JV1 conducted a Google Search by images using the logo and identified a school associated with the logo as Chilhowie Middle School, in Chilhowie, Virginia.¹

38. A Google Search by images is a content-based image-retrieval query technique provided by Google LLC that allows a user to search for related images by uploading an image or using the image URL. Google analyzes the submitted image and compares it with other images in Google’s databases before returning matching and similar image results.

¹ Chilhowie, Virginia is located in the Western District of Virginia.

39. During the investigation, JV1 provided law enforcement with screenshots of JV1's communications with WILLIAMS and stated that JV1 had communicated with WILLIAMS using a Snapchat account named "itzunreal173." On November 15, 2022, FBI Richmond Division sent a Federal Grand Jury Subpoena to Snap Inc. for subscriber information related to Snapchat username itzunreal173 (i.e., JV1's Snapchat account). A review of the responsive documents revealed that on July 19, 2022, JV1 changed Snapchat username itzunreal173 to jennystallingz. The user ID number for both usernames is 8b9c4cc0-d8b9-4ee2-b437-a73200fdf6e4.

40. On September 27, 2022, the Stillwater Police Department in Stillwater, Oklahoma preformed a forensic download of JV1's cellular telephone. The forensic download did not recover any Snapchat data.² However, during the

² In two previous affidavits, your affiant included the following (or statements to this effect):

On September 27, 2022, the Stillwater Police Department in Stillwater, Oklahoma [performed] a forensic download of JV1's cellular telephone. On November 23, 2022, FBI Richmond Division conducted a review of the data messages between the [itzunreal173] and todd_w3441

Those statements were accompanied by a table that recited messages between todd_w3441 and a Snapchat account that your affiant believed to be itzunreal173. At the time, I assumed those messages to have been derived from the forensic download of JV1's cellular device. In fact, those messages were not obtained from the forensic download, but from screenshots that JV1 provided to law enforcement. In addition, the account JV1 used to send the messages was itsunreal173 rather than itzunreal173 (with an "s" rather than a "z"). As noted above, during the investigation, JV1 stated that JV1 had communicated with WILLIAMS using a Snapchat account named "itzunreal173." JV1 did not, however, tell law enforcement that JV1 had also used a Snapchat account named "itsunreal173." Messages obtained from WILLIAMS's Snapchat account, todd_w3441, revealed that JV1 had used the "itsunreal173" account to send and receive the messages.

investigation, JV1 provided FBI Oklahoma City with screenshots of messages between JV1 and Snapchat display name Todd, which JV1 identified as todd_w3441. JV1 told FBI Oklahoma City the screenshots were from JV1's itzunreal173/jennystallingz Snapchat account. Those screenshots included the following messages:

User	Message	Date
todd_w3441	Hey	July 12, 2022
todd_w3441	Babe I'm sorry I've been super busy with work and family, it's not you at all, I miss our conversations	July 13, 2022
JV1	okkk	July 13, 2022
todd_w3441	What you you doing babe	July 13, 2022
JV1	playing xbox	July 13, 2022
todd_w3441	[Sent an image of an adult male with brown hair wearing a blue long-sleeved shirt. The male is sitting outside on a blue bench, with a white sedan parked in the background.]	July 14, 2022
todd_w3441	I just got home babe, wyd ["wyd" in this context means "what are you doing?" or "what you doing?"]	July 16, 2022
JV1	just laying down watching cop stuff on youtube	July 16, 2022

todd_w3441	Awww fun wish I was there	July 16, 2022
JV1	me too babe	July 16, 2022
todd_w3441	What would we dooooooooo babe	July 16, 2022
JV1	bruh	July 20, 2022
todd_w3441	I'm not ignoring you. I have work and I've been busy with my boss all week	July 21, 2022
JV1	ok	July 21, 2022
todd_w3441	I keep thinking about you sliding up and down on my dick now	July 28, 2022
todd_w3441	[Sent an image of a sunset with a paved area and a brown structure in the foreground.]	August 8, 2022
todd_w3441	[Sent an image of a two-story brick house with three dormer windows on the roof, white columns, and an attached car port with white trim.]	August 10, 2022
JV1	That's literally so pretty	August 10, 2022
todd_w3441	We just had a huge storm and the sky is so pretty right now	August 10, 2022
JV1	i see lol	August 10, 2022
todd_w3441	Lol true	August 10, 2022
todd_w3441	[Sent an image of a field and the sky.]	August 17, 2022
todd_w3441	[Sent an image of a city skyline.]	August 22, 2022

todd_w3441	[Sent an image of a city skyline.]	August 23, 2022
JV1	[Sent an unidentifiable image.]	August 24, 2022
JV1	[Sent an image of the interior of a vehicle.]	August 24, 2022
JV1	[Sent an unidentifiable image.]	August 24, 2022
JV1	good wby? ["wby?" in this context means "what about you?"]	September 9, 2022
todd_w3441	I'm good, tired, sleepy, long week	September 9, 2022
JV1	nice, I've got school today and i woke up with a sore throat feels like strep	September 9, 2022
todd_w3441	Damn, did you get over covid?	September 9, 2022
JV1	yeah, think so, but this doesn't feel like covid lol i have a question	September 9, 2022
todd_w3441	Strep sucks too lol okay what's your question	September 9, 2022
JV1	do you pay other boys too? or just me? an dorry I'm not snapping my service is just too bad to be snapping everyone	September 9, 2022
todd_w3441	No I don't pay other boys the way I do for you, there are people I know at home that I help every now and then but it's not the same, they are friends that need help at times, one is working in West Virginia right now on a road crew and ran out of food money so I sent him \$20. But it's not the same as I sent you	September 9, 2022

JV1	ohh okay another question	September 9, 2022
todd_w3441	He's just a friend, nothing else and okay what is it	September 9, 2022
JV1	I'm just curious lol, but since you work at a school have you ever done anything with a student? if that's too private sorry	September 9, 2022
todd_w3441	I don't work at a school though, I help with coaching things but that's volunteer an not my actual job, and no never	September 9, 2022
JV1	oh	September 9, 2022
todd_w3441	Yea lol	September 9, 2022
JV1	wyd now	September 9, 2022
todd_w3441	[Sent an image of the interior of a vehicle.]	"Yesterday" - Date Unknown
JV1	oh okay	"Yesterday" - Date Unknown
todd_w3441	How have you been? Lots of parties	"Yesterday" - Date Unknown
JV1	yes definitely haha, lots of parties ³	"Yesterday" - Date Unknown

³ See *supra* note 2. Your affiant previously included these messages in search warrant applications for Snapchat accounts itzunreal173 and todd_w3441. In those applications, your affiant attributed JV1's messages to Snapchat account itzunreal173/jennystallingz because JV1 attributed these messages to JV1's itzunreal173 Snapchat account. Further investigation has revealed that JV1's messages were sent using Snapchat account itsunreal173.

41. Based on the review of the above conversation between todd_w3441 and JV1 and my knowledge of how Snapchat works (discussed above and below), your affiant believes portions of the communications have been deleted. Nonetheless, I submit that these messages tend to corroborate JV1's statements during the CAF Interview that the user of the todd_w3441 paid JV1 money to send nude images of JV1 to todd_w3441, and that the user of todd_w3441 sent images of his "excited" penis to JV1.

42. In addition, a review of JV1's cellular telephone revealed messages between JV1 and other individuals, and some of those messages indicated that WILLIAMS was a source of income for JV1.

43. On October 14, 2022, FBI Richmond Division sent a 2703(f) Preservation Request to Snap Inc. for todd_w3441. FBI Richmond Division sent an additional 2703(f) Preservation Request to Snap Inc. for todd_w3441 on January 11, 2023.

44. Open-source research has identified an individual named Todd Stewart WILLIAMS (which is consistent with the Cash App username \$Toddswill) date of birth February 7, 1971, mailing address P.O. Box 1297, Chilhowie, Virginia, residential address 1010 Old Stage Road, Chilhowie, Virginia.⁴ Open-

⁴ My investigation to date indicates that WILLIAMS lives alone at 1010 Old Stage Road, Chilhowie, Virginia. Records indicate that there is another individual, a male with initials Z.C.,

source research indicates WILLIAMS is employed by Blum, Inc., a member of Smyth County School Board, and has held himself out as a middle-school basketball coach.⁵

45. The following is a comparison of an image sent from todd_w3441 to JV1 and the Virginia driver's license photograph of WILLIAMS.

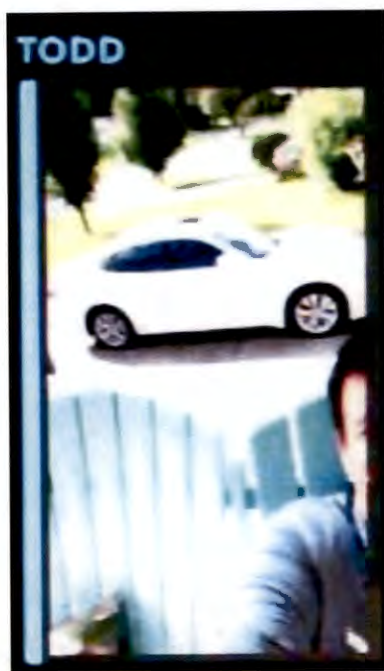


Image sent from todd_w3441 to JV1

whose driver's license reflects the address of 1010 Old Stage Road, Chilhowie, Virginia. In addition, Z.C. parks a car at 1010 Old Stage Road, and that car is registered to Z.C. One of WILLIAMS's cars is also jointly registered to Z.C. However, law enforcement in this investigation has only once observed Z.C. at 1010 Old Stage Road. Moreover, Z.C.'s name has not appeared in any records associated with the Snapchat, PayPal, Cash App, or Telegram accounts discussed in this affidavit.

⁵ Your affiant notes that Todd Stewart WILLIAMS was born in 1971, which is inconsistent with the age (37) that WILLIAMS provided to JV1. However, based on my training and experience, I know it is common for individuals who are seeking to obtain nude images from minors to provide inaccurate ages to their victims.



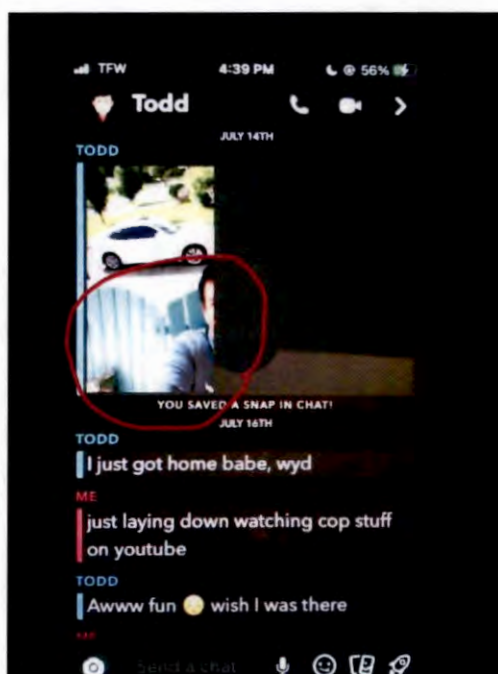
Todd WILLIAMS's Virginia driver's license photograph taken on April 23, 2018

46. The partially obscured individual in the image sent from todd_w3441 to JV1 is consistent with the Virginia driver's license photograph of WILLIAMS. In addition, my review of messages sent from todd_w3441 revealed various photos of WILLIAMS's face. Those photos, though not sent to juvenile victims, are likewise consistent with WILLIAMS's driver's license photo.

47. On November 9, 2022, FBI Richmond Division conducted physical surveillance of 1010 Old Stage Road, Chilhowie, Virginia. Vehicles observed in the driveway of 1010 Old Stage Road, Chilhowie, Virginia included a silver Jeep,

VA license plate UXA-5070 registered to Todd Stewart WILLIAMS, date of birth February 7, 1971, and a silver Honda Pilot, North Carolina license plate BDR-4909 registered to Blum, Inc.

48. The following is a comparison of a photograph sent from todd_w3441 to JV1 on July 14, 2022, and a photograph of 1010 Old Stage Road, Chilhowie, Virginia taken by Agents.



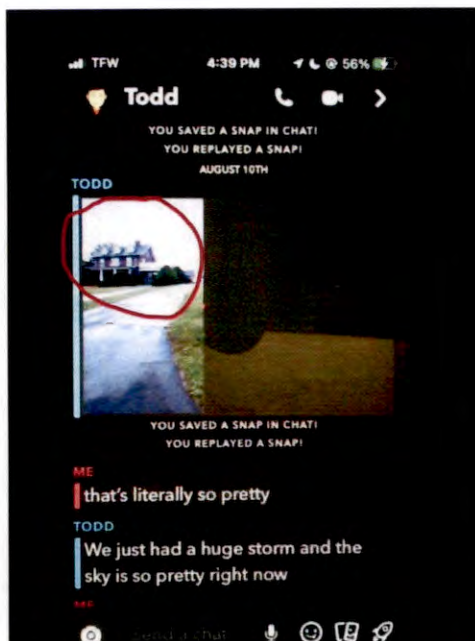
Photograph sent from todd_w3441 to JV1



Photograph of 1010 Old Stage Road, Chilhowie, Virginia taken by Agents

49. The blue chairs observed in the photograph sent from todd_w3441 to JV1 are consistent with the blue chairs observed on the porch of 1010 Old Stage Road, Chilhowie, Virginia.

50. The following is a comparison of a photograph sent from todd_w3441 to JV1 on August 10, 2022, and a photograph of 1027 Old Stage Road, Chilhowie, Virginia taken by Agents.



Photograph sent from todd_w3441 to JV1



Photograph of 1027 Old Stage Road, Chilhowie, Virginia taken by Agents

51. The residence observed in the photograph sent from todd_w3441 to JV1 is consistent with the residence located at 1027 Old Stage Road, Chilhowie, VA. 1027 Old Stage Road is across the street from 1010 Old Stage Road.

52. On November 15, 2022, FBI Richmond Division sent a Federal Grand Jury Subpoena to Snap Inc. for subscriber information related to Snapchat username todd_w3441. A review of the responsive documents revealed an active account with associated telephone number 864-237-2849 and IP address 73.113.51.184.

53. On December 23, 2022, FBI Richmond Division sent a Federal Grand Jury Subpoena to Verizon Wireless for subscriber information associated with the telephone number 864-237-2849. Responsive documents revealed the telephone number 864-237-2849 is currently registered to Todd WILLIAMS, P.O. Box 1297, Chilhowie, Virginia. Further, telephone number 864-237-2849 matches the phone number listed for “Todd Williams, Vice-Chairman” on a public website for the Smyth County School Board.⁶

54. On December 23, 2022, FBI Richmond Division sent a Federal Grand Jury Subpoena to Comcast for subscriber information associated with the IP address 73.113.51.184. Responsive documents revealed the IP address 73.113.51.184 is registered to Todd WILLIAMS, service address 1010 Old Stage Road, Chilhowie, Virginia, billing address P.O. Box 1297, Chilhowie, Virginia.

⁶ See https://www.scsb.org/apps/pages/index.jsp?uREC_ID=1652281&type=d&pREC_ID=1797644. Investigation has revealed another phone number that is also associated with WILLIAMS, 336-840-4398. The phone number appears to be connected with WILLIAMS's employment. My review of records indicates that a juvenile victim attempted to contact WILLIAMS at 336-840-4398, but it appears that WILLIAMS did not respond.

55. On November 15, 2022, FBI Richmond Division sent a Federal Grand Jury Subpoena to Block, Inc. for bank records related to the Cash App username \$Toddswill. Responsive documents indicate the Cash App username \$Toddswill is registered to Todd WILLIAMS, date of birth February 7, 1971. Between May 21, 2022, and October 21, 2022, WILLIAMS sent JV1 \$2,159.00 in ninety-three payments ranging from \$3.00 to \$135.00. Sixty-seven of the payments from WILLIAMS to JV1 were made using IP address 73.113.51.184. I believe this information further corroborates the information JVI provided during his forensic CAF Interview.

56. A payment request sent from WILLIAMS to JV1 on July 19, 2022, for \$100.00 is captioned "being my fav babe [heart emoji] and for kansas and for pods." A payment request sent from WILLIAMS to JV1 on July 19, 2022, for \$85.00 is captioned "kansas [heart emoji] !! [eggplant emoji]. Based on my training and experience, I know that an eggplant emoji is commonly used in text message exchanges to represent a penis. I believe this information tends to further corroborate the information JVI provided during his CAF Interview.

57. On March 23, 2023, FBI Richmond Division served a search warrant to Snap Inc. for Snapchat account todd_w3441. Responsive documents revealed the following messages between todd_w3441 and JV1 utilizing Snapchat account itzunreal173/jennystallingz:

User	Message	Date
todd_w3441	I saw you snap on Tiktok	May 17, 2022
todd_w3441	Okay babe, you mean to much to me	June 27, 2022
todd_w3441	What is taking so long to get there babe	June 28, 2022
JV1	we had to go to enid first and then we left around 3 [I believe "enid" refers to Enid, Oklahoma]	June 28, 2022
JV1	now we are 25 mins away from home	June 28, 2022
todd_w3441	Okay, you could almost be here in that time	June 28, 2022
JV1	how far are you	June 28, 2022
todd_w3441	Im joking, sort of, I mean Im farther but not that much I dont think, I dont know exactly where you live though so I might be wrong babe	June 28, 2022
JV1	so can we talk?	July 2, 2022
todd_w3441	About?	July 2, 2022
JV1	the age thing	July 2, 2022
JV1	i may be wrong but im 99% sure im right	July 2, 2022
JV1	babe	July 2, 2022
todd_w3441	Yea	July 2, 2022
JV1	so im right?	July 2, 2022

JV1	[Sent an image of a white male with the face obscured, wearing a black jacket.]	December 18, 2022
JV1	[Sent an image of JV1 wearing a yellow shirt in a reclined position.]	December 24, 2022

58. Further review of the responsive documents from the March 23, 2023, search warrant to Snap Inc. for account todd_w3441 revealed the following conversation between todd_w3441 and Snapchat username itsunreal173 (not itzunreal173):

User	Message	Date
todd_w3441	Babe I'm sorry I've been super busy with work and family, it's not you at all, I miss our conversations	July 13, 2022
todd_w341	I just got home babe, wyd	July 16, 2022
itsunreal173	Just laying down watching cop stuff on youtube	July 16, 2022
todd_w3441	Aww fun wish I was there	July 16, 2022
itsunreal173	me too babe	July 16, 2022
todd_w3441	What would we doooooooooo babe	July 16, 2022
todd_w3441	I keep thinking about you sliding up and down on my dick now	July 28, 2022
itsunreal173	[Sent an image of JV1 wearing a red shirt and tan hat with banner text, "fw it ask me anything."] [In this context, "fw" may mean "f**k with]	August 24, 2022

itsunreal173	i have a question	September 9, 2022
itsunreal173	do you pay other boys too? or just me?	September 9, 2022
todd_w3441	No I don't pay other boys the way I do for you, there are people I know at home that I help every now and then but it's not the same, they are friends that need help at times, one is working in West Virginia right now on a road crew and ran out of food money so I sent him \$20. But it's not the same as I send you.	September 9, 2022
itsunreal173	I'm just curious lol, but since you work at a school have you ever done anything with a student? If that's too private sorry	September 9, 2022
Todd_w3441	I don't work at a school though, I help with coaching things but that's volunteer and not my actual job, and no never	September 9, 2022
itsunreal173	why the new snap	October 19, 2022

59. Some of the messages recovered between itsunreal173 and todd_w3441 are consistent with the messages in the screenshots JV1 provided to FBI Oklahoma City. However, as noted elsewhere, it appears JV1 was incorrect in attributing the messages to JV1's itzunreal/jennystallingz Snapchat account. No images or videos of JV1 containing child pornography were recovered.

60. On March 23, 2023, FBI Richmond served a search warrant to Snap Inc. for username itzunreal173/jennystallingz. Responsive documents revealed the messages between todd_w3441 and itzunreal173/jennystallingz described above. No images or videos of JV1 containing child pornography were captured.

61. On October 17, 2023, FBI Richmond sent a Federal Grand Jury Subpoena to Snap Inc. for subscriber information pertaining to Snapchat username itsunreal173. Responsive documents revealed an account with display name of JV1 (meaning JV1's actual name) and telephone number +1 405-762-3219. (A Federal Grand Jury Subpoena to Block, Inc. on November 15, 2022, revealed telephone number +1 405-762-3219 was also associated with Cash App account \$unreal1738, belonging to JV1.) Snapchat account itsunreal173 was deleted on December 4, 2022. Based on this information and the consistent messages between Snapchat account itsunreal173 and the screenshots provided by JV1 your affiant believes Snapchat username itsunreal173 also belonged to JV1 and was also used to communicate with WILLIAMS.

62. Further review of WILLIAMS's Cash App account revealed WILLIAMS sent multiple payments to multiple other minor males during the same timeframe. Juvenile Victim 2 ("JV2") received \$200.00 in five payments ranging from \$30.00 to \$60.00. Juvenile Victim 3 ("JV3") received \$860.00 in ten

payments ranging from \$50.00 to \$150.00. Juvenile Victim 5 ("JV5") received one payment of \$30.00 which was subsequently refunded.

JUVENILE VICTIM 2

63. In a CAF Interview conducted on January 23, 2024, JV2 provided the following information:

- a. JV2 met WILLIAMS approximately three years ago when WILLIAMS added JV2 on Snapchat. At the time, JV2 was using the Snapchat username stopbanningnyk.
- b. WILLIAMS learned JV2 liked to play Roblox⁷ when JV2 posted a Snap story that said, "Does anyone want to buy me Robux?" (Robux is in-game currency that allows Roblox users to purchase items and access games within the Roblox ecosystem.) WILLIAMS offered to purchase Robux for JV2. JV2 agreed. WILLIAMS purchased approximately \$400.00 worth of Robux for JV2 on two separate occasions. JV2 did not remember JV2's Roblox username and is locked out of the account.
- c. After WILLIAMS purchased Robux for JV2 for the second time, WILLIAMS asked JV2 to send WILLIAMS nude images of JV2 on Snapchat. JV2 felt like JV2 shouldn't have taken WILLIAMS's

⁷ Roblox is an online game platform.

money but nonetheless sent WILLIAMS images of JV2's penis and anus, taken while JV2 was in the shower, from "stopbanningnyk."

The first time JV2 sent nude images to WILLIAMS, JV2 sent the images to Snapchat username todd_w3441. JV2 identified Snapchat username todd_w3441 as WILLIAMS's old Snapchat account.

- d. JV2 was in contact off and on with WILLIAMS via Snapchat for approximately three years. JV2 would communicate with WILLIAMS for approximately a week, then not hear from WILLIAMS again for a few months. JV2 felt JV2 had to send WILLIAMS nude images because WILLIAMS kept sending JV2 money and repeatedly messaging JV2. Once JV2 sent WILLIAMS the nude images, WILLIAMS would stop communicating with JV2. JV2 thought JV2 might get in trouble for sending WILLIAMS images of JV2's penis and anus to WILLIAMS, but JV2 felt JV2 was "in too deep" to stop.
- e. During the time of contact between JV2 and WILLIAMS, JV2 opened a Cash App account. WILLIAMS began sending JV2 money via Cash App in exchange for nude images and videos on Snapchat. JV2 sent WILLIAMS nude images and videos every time WILLIAMS made a payment to JV2's Cash App account. Payments from WILLIAMS for

\$10.00 or \$12.00 were for one nude image of JV2. Payments from WILLIAMS for \$30.00 were for multiple nude images of JV2.

Payments from WILLIAMS for \$60.00 were for a nude video of JV2.

- f. Also, during that time, WILLIAMS stopped using Snapchat username todd_w3441 and started using "tsw0708." JV2 identified "tsw0708" as WILLIAMS's then-current Snapchat account. Furthermore, during that time, "stopbanningnyk," belonging to JV2, was permanently locked by Snapchat. JV2 created a new Snapchat username "nykgothacked." JV2 has sent WILLIAMS "hundreds" of photographs and multiple videos of JV2's penis and anus from "stopbanningnyk" and "nykgothacked" to "tsw0708."
- g. JV2 usually took the photographs and videos of JV2's penis and anus to send to WILLIAMS in JV2's bedroom or bathroom. JV2 sent the multimedia content as live snaps. (A live snap is a photograph or video that a user takes within the SnapChat application that expires after 24 hours. Recipients can only view the content once, and then it disappears.) WILLIAMS saved the live snaps of JV2. JV2 would get notifications from Snap Inc. that the multimedia content had been "saved in chat." (Saving a snap "in chat" saves the image or video to SnapChat servers. Users can then export the image or video directly

to their device. Users are also able to take screenshots of images or videos that have been saved in chat.)

- h. On one occasion, WILLIAMS sent JV2 an image of what JV2 described a juvenile male's torso, penis, and upper thighs.

WILLIAMS asked JV2 to use the image as an example and send a similar photograph of JV2 to WILLIAMS. On another occasion, WILLIAMS requested JV2 "do something weird" with JV2's dog. JV2 did not send the requested image. (JV2 did not want to provide further details regarding the specific content of the request.)

WILLIAMS also wanted to meet JV2 in person once JV2 got a driver's license and a vehicle. WILLIAMS offered JV2 "a lot of money" to meet and have sex. However, JV2 has never met WILLIAMS in person.

- 64. JV2 was 15 years old at the time of the CAF Interview.

65. On February 11, 2024, FBI Richmond sent a 2703(f) Preservation Request to Snap Inc. for "tsw0708," "stopbanningnyk," and "nykgothacked." Your affiant received an email response from lawenforcement@snapchat.com that stated Snap Inc. had "previously taken action against the account "stopbanningnyk," preserved the account information consistent with 18 U.S.C. § 2258A, and filed a report with the National Center for Missing and Exploited Children (NCMEC)."

66. FBI Richmond obtained a copy of NCMEC Cybertipline Report for Snapchat account “stopbanningnyk.” The report included two media files categorized as “child pornography unconfirmed.” Only one file had been viewed by Snap Inc., and so only that file was viewable by law enforcement. The file contained a 53-second video of two adolescent males. In the video, Adolescent Male 1 (approximate age 10-12) is standing, exposing his erect penis and testicles. Adolescent Male 2 (approximate age 8–10) is laying on a raised surface on his back with his legs spread, exposing his erect penis, testicles, and buttocks. Adolescent Male 1 is anally penetrating Adolescent Male 2 with Adolescent Male 1’s erect penis. Adolescent Male 1 is simultaneously using Adolescent Male 1’s hand to physically stimulate Adolescent Male 2’s erect penis. Background audio captures conversation in what appears to be a foreign language. Legal process to Snap Inc. is required for law enforcement to view the second file as it was not previously viewed by Snap.

67. In the January 23, 2024, CAF Interview, JV2 stated that JV2 was last in contact with WILLIAMS between late December 2023 and early January 2024. WILLIAMS asked JV2 to communicate with WILLIAMS on the application Telegram so they “wouldn’t get in trouble.” WILLIAMS also told JV2 that WILLIAMS’s Cash App account “got banned” and sent JV2 approximately \$60.00 on PayPal. In exchange, JV2 sent WILLIAMS one nude video of JV2 in the

shower. JV2 also sent nude images and videos to another individual on Telegram at the same time as WILLIAMS. JV2 identified this individual as “Nick Mason.”

68. On January 11, 2024, FBI Richmond obtained consent from JV2’s parents to conduct a search of JV2’s cellular telephone. A review of the device identified “nykgothacked.” However, no communications with “tsw0708” were found on the device. Based on my knowledge of how Snapchat works (as explained above), such communications are often deleted from the device.

69. A review of the device identified a Telegram account with Telegram username opiedok, display name opie, telephone number +1 407-717-2620, belonging to JV2. A review of JV2’s Telegram account identified the following conversation between JV2 and Telegram username TSW0708, display name TW on January 6, 2024. (The Telegram username TSW0708 is consistent with the Snapchat username tsw0708, known to belong to WILLIAMS):

User	Message
JV2	hey
TSW0708	Hey
JV2	hru [In this context, “hru” means “how are you?”]
TSW0708	Pretty good, how have you been? It’s been a long time
JV2	I’m doing okay i’m still been selling nudes for some money cause im tryna get a car
TSW0708	Have you been selling a lot

TSW0708	Are you 16 now? I can't remember when the birthday is
JV2	i'm 15 i turn 16 in 6 months so i've been tryna save for a car
JV2	and no i have one buyer
JV2	do you wanna buy by any chance
TSW0708	I can't right now but sure I will still buy from you. I don't have cashapp though. I can't remember how we did it before
JV2	paypal
TSW0708	Okay that's right, I remember
JV2	yeah
JV2	my paypal is @1uvnyk
JV2	add my snapchat [At this time, JV2 was utilizing "nykgothacked"]
TSW0708	I added [At this time, JV2 identified WILLIAMS as utilizing "tsw0708"]
TSW0708	I still have you in my PayPal from last time
TSW0708	It's the same you 1unyk
JV2	yeah
TSW0708	Do you want to do it now?
JV2	yeah sure
TSW0708	Do you have like one saved are are you going to jerk now?
JV2	saved
TSW0708	Okay yea I'd like to see it, hold on I'll send \$35

JV2	alright
JV2	lmk when sent
TSW0708	Okay I sent it [Timestamp: 5:22 PM]
JV2	okay
JV2	hold on
TSW0708	Okay
TSW0708	That is really nice, and a really really nice cum shot [Timestamp: 5:39 PM]
JV2	ty
TSW0708	You're welcome
TSW0708	I do believe that is the first time I've ever seen you cum [smiley face emoji with three hearts] its's very nice
JV2	how old u
TSW0708	Older than you lol
JV2	gimme a number my other buyer wants to know
TSW0708	He's probably just wanting to know if he can buy from me too
JV2	no
JV2	he isn't
TSW0708	How old is he
JV2	27
TSW0708	Have you known him for long? We've know each other for like 2 years I think, it's been awhile
TSW0708	yeah i've known him for like a year now

JV2	[Sent the link http://t.me/+UPeiHizgCplkYjJh with description "Telegram buyers, opie invites you to join this group on Telegram."]
JV2	join the group

70. A review of JV2's device also identified the following conversation between JV2 and Telegram user whatup0987654321, display name Nick, telephone number +1 412-480-9841 on January 6, 2024. In a CAF Interview, JV2 identified the "other" buyer referenced below (in rows 6 and 7 of the table) as WILLIAMS.

User	Message
whatup0987654321	Hi
JV2	hey
whatup0987654321	So you like this better?
JV2	it's just safer
whatup0987654321	So how old if your other gutter
whatup0987654321	buyer
JV2	Still scrolling through me nd his chats
whatup0987654321	So how would it work us in a group chat with nudes?
JV2	basically you with both buy and i'll send it to the group
whatup0987654321	Oh. I like the personal aspect yk ["yk" in this context means "you know"]
JV2	yuh
JV2	how do i make a group

whatup0987654321	I wanna know how old he is first [nervous emoji]
JV2	i forgot i think 30
whatup0987654321	So you have him on here or snap too?
JV2	both
JV2	how old r u again?
whatup0987654321	27
whatup0987654321	How often he buy?
JV2	every one in a while
whatup0987654321	Do I buy more or?
JV2	yeah just a little more
whatup0987654321	[Sent the link http://t.me/+UPeiHizgCplkYjJh with description "Telegram buyers, opie invites you to join this group on Telegram."]
whatup0987654321	Good. Glad I can
JV2	Mhm [indicating agreement]
whatup0987654321	I'm glad I can support you
JV2	thank you for everything
whatup0987654321	Yw. I'm sorry if I get weird and stuff. When i get horny it's unpredictable [crying emoji]
JV2	lol it ok
whatup0987654321	Do you like calling me baby?
JV2	sometimes
whatup0987654321	Do you like me calling you baby?

whatup0987654321	Since it's now a shared group, how we doing payment since we are both getting the stuff??
whatup0987654321	Cuz 75 is weird if it's in half if you know what I mean
JV2	now you both pay the full price
whatup0987654321	We both pay the full price? Damn
JV2	yeah
whatup0987654321	So you are getting 120 for a shower vid? Damn
JV2	Mhm [indicating agreement]
JV2	i do need the money tho tbh [in this context, "tbh" means "to be honest"]
whatup0987654321	Ik you do. So you would be charging 60 if I would just buy it? [in this context "Ik" means "I know."]
JV2	yeah and if he didn't buy it then you would only get it
whatup0987654321	You deserve everything you get [nervous emoji]. When you think he'll but again
JV2	he bought cum shot earlier
whatup0987654321	Nine
whatup0987654321	Nice

71. A review of JV2's device also revealed the following conversation between JV2, Telegram username TSW0708 (display name TW), and Telegram username whatup0987654321 (display name Nick, telephone number +1 412-480-9841) on January 6, 2024. The group message thread is titled "buyers."

User	Message
Automatic Note	opie created the group "buyers"
Automatic Note	Nick joined the group via invite link
Automatic Note	TSW joined the group via invite link
JV2	okay look you two are my only buyers so this makes it easier on me to sell to you both. you both know about my weird situation today but imma make a new menu for you guys and then i will send u it okay?
TSW0708	Okay
whatup0987654321	Ok
JV2	[Sent an iCloud document titled "priv info" with the following text: "my menu. pictures: \$10 for 1 pic, \$20 for 5 pics, \$30 for 12 pics, videos: \$10 for 1 video, \$20 for 5 videos, \$30 for 9 videos, \$35 for cum shot, \$50 for hole play, \$75 for shower video at least 3 mins, photos and videos can be: butt, dick, feet, full body."]
JV2	some cheap some expensive i know
whatup0987654321	It's ok. You deserve it though
TSW0708	Okay, leave the menu in here
whatup0987654321	@TSW0708 what you wanna see the most?
TSW0708	Everything on here is really good
JV2	so like for example say you both wanna get 1 pic for \$10 you would both send \$10 yk?
JV2	actually shower video isn't \$75 it's gonna be \$60

TSW0708	That was my question too, if you're sending it to the group do we split the cost? Or no?
whatup0987654321	Nope. We both pay the price in menu for that thing/s
TSW0708	So as an example, if we each pay \$10 then two pics are sent to the group? 1 for each \$10? Just making sure I understand the menu
whatup0987654321	No \$10 each for that 1 pic
TSW0708	Ahh, okay
JV2	yeah
JV2	and I'm going on a cruise in march so im kinda wanting a little bit of spending money just in case there's anything i want
whatup0987654321	We'll get you some spending money
JV2	alr thanks
JV2	you guys are the best
JV2	alright so you do guys both want to buy a hole play [thumbs up emoji, N emoji] [in this context, the N emoji may be referencing JV1's first name.]
TSW0708	Okay
JV2	alr u both have my paypal
JV2	@1uvnyk
JV2	lmk when u both sent
TSW0708	Done [Timestamp 7:21 PM]
JV2	alright u both payed i will send it a little later im about to eat supper [Timestamp 7:30 PM]
whatup0987654321	Alright. Take your time

JV2	I'll do it here in a min
TSW0708	Okay sounds good
JV2	[Sent a 22 second video of JV2. JV2 is laying on JV2's back on what appears to be a bed. JV2 is not wearing any clothing. JV2's legs are spread and up in the air to expose JV2's anus. JV2 is digitally manipulating JV2's anus. At times the recording also captures JV2's testicles and the lower half of JV2's face.] [Timestamp: 8:40 PM]
JV2	[heart emoji, N emoji]
TSW0708	Very nice, thank you
whatup0987654321	Looking forward to that shower vid soon [monkey emoji]
JV2	well u have to buy it first lol
whatup0987654321	Ik [meaning "I know"] we will soon
JV2	ok
JV2	if yall buy it rn [meaning "right now"] i can send it when i shower in like a few mins
whatup0987654321	Not tn [meaning "tonight"] [sad face emoji]. Soon i promise
JV2	ok

72. The following is a continuation of the above conversation between JV2 and Telegram user TSW0708, display name TW on January 6, 2024:

User	Message
TSW0708	I will give you credit, you are a lot better at making videos since the last time we talked, that you for that one [Timestamp: 8:53 PM]
JV2	thank youu
TSW0708:	You're welcome! I really mean it. That was really good
JV2	;))
TSW0708	I remember you used to be uncomfortable doing videos like that, playing with your hole. If it sill makes you uncomfortable you could take it off your list
JV2	i need the money
TSW0708	As long as you do quality video and photos, you will get money. The quality of this one was much better than it used to be
JV2	i have iphone 15 now
TSW0708	Ohhh nice, that makes a difference in the quality
JV2	yeah

73. Continued review of JV2's cellular telephone identified the following email communications between JV2, utilizing a Gmail address and service@paypal.com:

Timestamp	Email Subject Line	Email Message Content
January 6, 2024, 5:22 PM	Money is waiting for you	Accept your \$35.00 USD from Todd Williams

January 6, 2024, 7:23 PM	Money is waiting for you	Accept your \$50.00 USD from Nicholas Mason, Note from Nicholas Mason: Cruise [three cruise ship emojis]
January 6, 2024, 7:24 PM	Money is waiting for you	Accept your \$50.00 USD from Todd Williams

74. A Federal Grand Jury Subpoena to PayPal, Inc. revealed account number 1687746496956931697 subscribed to by WILLIAMS and account number 5240121852474272224 subscribed to by JV2. On January 6, 2024, WILLIAMS sent JV2 the following payments:

Timestamp	Amount	Payment Status
January 6, 2024 22:22:09 Coordinated Universal Time ("UTC") [January 6, 2024 05:22:09 PM EST]	\$35.00	Completed
January 7, 2024 00:21:07 UTC [January 6, 2024 07:21:07 PM EST]	\$50.00	Completed

75. The time stamps associated with the payments from WILLIAMS to JV2 correspond to the timestamps of the Telegram messages described above. The media believed to be associated with payment one was not recovered. The media

associated with payment two is the video containing child pornography of JV2 described above. JV2 is currently sixteen years old but was fifteen years old at the time of the above communications.

76. Between August 15, 2022, and January 7, 2024, WILLIAMS sent JV2 \$973.00 in twenty-six payments ranging from \$5.00 to \$100.00 via multiple Cash App and PayPal accounts subscribed to by WILLIAMS.

77. On October 17, 2023, FBI Richmond sent a Federal Grand Jury Subpoena to Snap Inc. for subscriber information associated with the Snapchat username tsw0708. Responsive documents revealed an account created on October 17, 2022, using email address orangegobbler@gmail.com and telephone number 864-237-2849. (Legal process served to Verizon Wireless on December 3, 2022, indicated telephone number 864-237-2849 was subscribed to by Williams, address P.O. Box 1297 Chilhowie, VA 24319. The display name on tsw0708 was "TSW TSW." (The initials TSW are consistent with the name Todd Stewart Williams.) IP address 73.113.51.184 was used to access the account. IP address 73.113.51.184 was also used to access SnapChat account todd_w3441, (known to belong to Williams), and legal process served to Comcast on December 21, 2022, indicated IP address 73.113.51.184 is subscribed to by WILLIAMS, service address 1010 Old Stage Road, Chilhowie, VA 24319, billing address P.O. Box 1297, Chilhowie, VA 24319, telephone number 864-237-2849.

78. On November 13, 2023, FBI Richmond served a Federal Grand Jury Subpoena to Google LLC for subscriber information associated with the email address orangegobbler@gmail.com. Responsive documents revealed the account is subscribed to by WILLIAMS, telephone number 864-237-2849.

79. On March 14, 2024, FBI Richmond conducted a search of Snapchat account tsw0708. Relevant communications between WILLIAMS and JV2 were recovered in which WILLIAMS and JV2 discuss prices for photos and share login information for Cash App, PayPal, and Venmo. However, no additional media containing child pornography of JV2 was recovered.

JUVENILE VICTIMS 3 and 4

80. Further review of Snapchat account tsw0708 identified extensive communications between WILLIAMS and JV3. JV3 is currently seventeen years old but was fifteen and sixteen years old during the time of the communications. The following examples are a representative sample of the communications between JV3 and WILLIAMS.

January 30, 2023	
JV3	<p>[Sent WILLIAMS a 3-second video of JUVENILE VICTIM 4 ("JV4) licking the anus of JV3.]</p> <p>[Sent WILLIAMS an image of JV4 licking the anus of JV3.]</p> <p>[Sent WILLIAMS a 3-second video of JV4 performing oral sex on JV3's erect penis. In the video, JV4 is laying on JV4's stomach. JV3 is kneeling in front of JV4. JV4 is</p>

	<p>shirtless but covered by a blanket. JV3 is also shirtless but is wearing underwear pulled down to expose JV3's erect penis and testicles.]</p> <p>[Sent WILLIAMS an image of JV4 performing oral sex on JV3's erect penis. In the image, JV3 is kneeling in front of JV4 with JV3's torso and penis exposed.]</p>
JV3	[Sent WILLIAMS a 9-second video of JV4 repeatedly stroking the erect penis of JV3. At 00:05, JV4 begins performing oral sex on JV3. JV4 is fully clothed. JV3 is wearing a black shirt.]

81. On January 30, 2023, WILLIAMS sent JV3 \$100.00 via Cash App account \$Toddswill.

82. Investigation led to the identification of JV4 as JV3's younger stepsibling. JV4 is currently twelve years old but was ten years old during the time of the communications.

May 17, 2023	
JV3	<p>[Sent WILLIAMS a nude image of a JV3 laying on what appears to be a bed. In the image, JV3's stomach, penis, testicles, and legs are exposed. JV3 is holding JV3's penis.]</p> <p>[Sent WILLIAMS a nude image of a JV3 with buttocks spread to expose JV3's anus and testicles.]</p> <p>[Sent WILLIAMS an image of JV3 laying on what appears to be a bed. In the image, JV3's stomach, penis and testicles are exposed. JV3 is holding JV3's penis.]</p> <p>[Sent WILLIAMS an image of JV3 laying on what appears to be a bed. In the image, JV3's stomach and erect penis are visible. JV3 is holding JV3's erect penis.]</p>

	[Sent WILLIAMS an image of JV3 laying on what appears to be a bed. In the image, JV3's stomach, penis, and upper thighs are exposed.]
JV3	Did you see them
WILLIAMS	Yes do you have any more? Or some of you and your brother together
JV3	[Sent a video of JV4 and JV3 that lasted less than one second. In the video, JV4 is lying on JV4's back. JV4 is nude from the waist down and wearing a black sweatshirt. JV3 is nude and kneeling over JV4. JV4 is stroking JV3's erect penis with JV4's hand.] [Sent an image of JV4 holding the erect penis of JV3.]
WILLIAMS	More of these does he cum yet
JV3	Can you send that card info so I can get cash in the morning to make it to school
WILLIAMS	4264 3300 2034 1784
WILLIAMS	Exp 05/28
WILLIAMS	Security code is 033 if it asks for it

83. In a CAF Interview on July 17, 2024, JV3 provided the following information:

- a. JV3 met WILLIAMS through Snapchat. WILLIAMS knew JV3 was in high school. JV3 shared JV3's problems with WILLIAMS, and WILLIAMS offered to help JV3 with money. JV3 sent WILLIAMS nude images and videos of JV3 in exchange for Cash App payments.

- b. JV3 reached the \$600.00 limit on monthly Cash App transactions, so WILLIAMS set up a plan to send JV3 a debit card to make the monetary transactions easier. WILLIAMS sent JV3 a debit card linked to one of WILLIAMS'S bank accounts hidden inside a pair of "Hey Dude" brand shoes.
- c. WILLIAMS requested JV3 send media of JV3 and JV4 engaging in sexual activity. JV3 took the photographs and recorded the videos sent to WILLIAMS in JV3 or JV4's bedroom.
- d. JV3 knew WILLIAMS saved the photographs and videos JV3 sent because Snapchat notifies the sender if the recipient saves the content.
- e. JV3 confirmed that all the media containing child pornography sent to WILLIAMS via Snapchat was of JV3 and JV4.

84. In a CAF Interview on July 18, 2024, JV4 provided the following information:

- a. JV3 would approach JV4 in their bedrooms at night and show JV4 pornography. JV3 would masturbate and take pictures of JV3's penis and testicles.
- b. JV3 had JV4 "lick and suck" JV3's penis and testicles while JV3 took pictures and videos. After obtaining the media, JV3 would have JV4 stop the sexual activity.

- c. JV4 estimated JV4 was approximately eight years old the first time JV3 approached JV4, and the activity continued until JV4 was eleven years old. The activity stopped because JV4 no longer lived with JV3 as JV4 moved in with JV4's biological mother.
- d. JV4 confirmed JV3 and JV4's identities and identified their furniture in the media recovered from WILLIAMS's Snapchat account.
- e. JV4 did not know what JV3 did with the photos or videos containing child pornography but recently learned from adult family members that JV3 had been selling the media online.

85. The following messages recovered from WILLIAMS's Snapchat account corroborate JV3 and JV4's statements.

June 22, 2023 – July 21, 2023	
WILLIAMS	I can have a debit card made for you and send it to you, you wouldn't need Venmo or cashapp, you would have your own debit card
JV3	If u want that's fine just it needs to have my name on the package when u deliver it so my mom don't question but ya that's fine with me and would make it easier
WILLIAMS	If It has your name on it are you sure she will leave it alone?
WILLIAMS	Tell her you ordered Hey Dudes and let me get them for you and I can tape the card to the inside of the shoe

WILLIAMS	There is a store here called Surf and Dirt that stocks tons of Hey Dudes, I'll go tomorrow and send you pics of what they have so you can tell me which ones to get
WILLIAMS	[Sent JV3 1 video and 7 images of a display of Hey Dude shoes/individual pairs.]
JV3	The 3 rd gray and black ones
JV3	[sent mailing address]
JV3	That's my address for the shoes
JV3	<p>[Sent WILLIAMS a nude image of a JV3 seated on a white toilet. In the image, JV3's torso, penis, testicles, and thighs are exposed.]</p> <p>[Sent WILLIAMS a nude image of JV3 seated on a white toilet. In the image, JV3's torso, erect penis, testicles, and upper thighs are exposed.]</p> <p>[Sent WILLIAMS a nude image of a JV3 standing in a bathroom. In the image, JV3's torso, erect penis, and legs are exposed.]</p> <p>[Sent WILLIAMS a nude image of a JV3 bent over with buttocks spread to expose JV3's anus and testicles.]</p>
WILLIAMS	I will get a tracking number for you today
WILLIAMS	When you get a chance send me a pic of the front and back of the bank card, I'm going to set up a Zelle account for it to transfer money easier
JV3	[Sent WILLIAMS an image of a Visa Debit Card from The Bank of Marion with name TODD WILLIAMS, card number 4264 3300 2035 0520, and expiration date 06/28.]
JV3	[Sent WILLIAMS an image of the back of a debit card with CVV 114. The card is unsigned.]
WILLIAMS	Okay, I'm going to put \$200 in for you and that will get the account to about \$242

JV3	<p>[Sent WILLIAMS a 14-second video of JV3 masturbating to completion. In the video, JV3's torso, penis, and testicles are visible. JV3 is repeatedly stroking JV3's erect penis. At 00:03, JV3 ejaculates onto JV3's stomach.]</p> <p>[Sent WILLIAMS an image of JV3 holding JV3's erect penis. In the image, JV3's torso, penis, and testicles are visible.]</p> <p>[Sent WILLIAMS a 10-second video of JV3 masturbating. In the video, JV3's torso is exposed and JV3 is wearing gray underwear. JV3 repeatedly strokes JV3's erect penis through JV3's underwear. At 00:05, JV3 pulls down JV3's underwear to expose JV3's erect penis. JV3 repeatedly strokes JV3's erect penis.]</p> <p>[Sent WILLIAMS a 6-second video of JV3 masturbating. JV3 is standing with JV3's lower stomach, penis, testicles, and legs exposed. In the video, JV3 is repeatedly stroking JV3's erect penis.]</p> <p>[Sent WILLIAMS an image of a JV3 holding JV3's erect penis. In the image, JV3 is standing with JV3's torso, penis, testicles, and legs exposed.]</p> <p>[Sent WILLIAMS a nude image of JV3. In the video, JV3 appears to be lying on JV3's back with JV3's torso, erect penis, and testicles exposed. JV3 is pulling down JV3's gray sweatpants to expose JV3's groin area.]</p> <p>[Sent WILLIAMS a nude image of JV3 holding JV3's gray underwear open to expose JV3's erect penis and testicles.]</p> <p>[Sent WILLIAMS a nude image of JV3. In the image, JV3's lower stomach, penis and testicles are exposed. JV3 has a brown towel wrapped around JV3's thighs.]</p> <p>[Sent WILLIAMS a nude image of a JV3. In the image, JV3 appears to be lying on JV3's back with legs and buttocks spread to expose JV3's anus, penis, and testicles.]</p> <p>[Sent WILLIAMS a nude image of JV3. In the image, JV3's torso, penis, testicles, and upper thighs are exposed.]</p>
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	[Sent WILLIAMS an image of JV3 holding JV3's erect penis. In the image, JV3 is wearing a condom.]
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86. Between November 13, 2022, and January 4, 2024, JV3 sent WILLIAMS, via Snapchat, 112 photographs and 147 videos containing child pornography of JV3, JV4, or both juveniles. Between November 13, 2022, and May 3, 2023, WILLIAMS sent JV3 \$3,650.00 in thirty-nine payments ranging from \$50.00 to \$200.00 via multiple Cash App and PayPal account subscribed to by WILLIAMS.

JUVENILE VICTIMS 5 and 6

87. Further review of Snapchat account tsw0708 identified extensive communications between WILLIAMS and Juvenile Victim 5 ("JV5"). JV5 is currently seventeen years old but was sixteen to seventeen years old during the time of the communications. The following examples are a representative sample of the communications between JV5 and WILLIAMS.

February 3, 2023	
JV5	Wanna buy some videos ?? I got 4 for \$15
WILLIAMS	Heyy what do you have tn
JV5	I got 3 videos of me jerking and one of my nutting
WILLIAMS	Okay nice, are they different than ones you sent before?
JV5	Yea I just make 2 of them in the shower last night and then I made the one yesterday morning and then the other

	one if from like 2-3 hours ago when I got down drying my shirts
WILLIAMS	Okay cool, I'll send \$15 right now, I wish we lived close
JV5	Ight and I wish we did too
WILLIAMS	I just sent it, I'm in Virginia like on the western side in the mountains
JV5	It would be so hot to fuck there
JV5	Fuck*
JV5	<p>[Sent WILLIAMS an 11-second video of JV5 ejaculating onto JV5's stomach. In the video, JV5 appears to be laying on JV5's back with JV5's stomach, penis, and testicles exposed. JV5 is repeatedly stroking his erect penis while ejaculating.]</p> <p>[Sent WILLIAMS an image of JV5 holding JV5's erect penis. In the video, JV5 appears to be laying on JV5's back.]</p> <p>[Sent WILLIAMS a 5-second video of JV5 masturbating in the shower. In the video, JV5 is standing with JV5's penis and testicles visible. JV5 is repeatedly stroking JV5's erect penis.]</p> <p>[Sent WILLIAMS an image of JV5 holding JV5's erect penis. In the image, JV5 appears to be standing in a shower.]</p> <p>[Sent WILLIAMS a 17-second video of JV5 masturbating in the shower. In the video, JV5 is standing with JV5's penis and testicles exposed. JV5 is repeatedly stroking his erect penis. Shower water can be heard running in the background.]</p> <p>[Sent WILLIAMS an image of JV5 holding JV5's erect penis. In the image, JV5 appears to be standing in the shower.]</p> <p>[Sent WILLIAMS an 8-second video of JV5 masturbating. In the video, JV5 appears to be laying on</p>

	JV5's back with JV5's stomach, penis, and testicles visible. JV5 is repeatedly stroking JV5's erect penis.] [Sent WILLIAMS an image of JV5 laying on JV5's back holding JV5's erect penis. In the image, JV5's stomach, penis, and testicles are visible.]
WILLIAMS	So hottt I love them all, I really love the shower videos and I wish I was on my knees ducking your beautiful dick yes it would be so hot to fuck
JV5	Thank you baby

88. On February 3, 2023, WILLIAMS sent JV3 \$15.00 via Cash App account \$Toddswill.

February 25, 2023	
JV5	Hey I got 5 photos and 3 videos for \$30 or 3 photos for and 1 for \$20
WILLIAMS	Heyy I'll send you \$30 I've been thinking about you a lot the last couple of days
JV5	Okay lmk and I'll send them
WILLIAMS	Okay one sec but I have a question too, does it bother you if I save them?
JV5	No go ahead
JV5	[Sent WILLIAMS an image of JV5 holding JV5's erect penis. In the image, JV5's torso, penis, testicles, and upper thighs are visible.] [Sent WILLIAMS a 2-second video of JV5 ejaculating. In the video, JV5's face, penis, and testicles are visible. JV5 is stroking JV5's erect penis while he ejaculates.] [Sent WILLIAMS an image of JV5 holding JV5's erect penis.]

	<p>[Sent WILLIAMS a 9-second video of JV5 masturbating to completion. In the video, JV5 is seated on a toilet and is repeatedly stroking JV5's erect penis.]</p> <p>[Sent WILLIAMS an image of JV5 holding JV5's erect penis.]</p> <p>[Sent WILLIAMS an image of JV5 bent over to expose JV5's anus and testicles.]</p>
JV5	<p>[Sent WILLIAMS a nude image of JV5 standing with JV5's torso, penis, testicles, and legs exposed.]</p> <p>[Sent WILLIAMS a 14-second video of JV5 masturbating to completion.]</p> <p>[Sent WILLIAMS an image of JV5 holding JV5's erect penis.]</p>
WILLIAMS	Ugh so beautiful the things I want to do
WILLIAMS	You get me so hard every time lol

89. On February 25, 2024, WILLIAMS sent JV5 \$30.00 via Cash App account \$Todwilli.

November 19, 2023	
JV5	<p>[Sent WILLIAMS an image of JV5 on hands and knees on what appears to be a bed with gray sheets. In the image, JV5's underwear is pulled down to expose JV5's buttocks. JUVENILE VICTIM 6's ("JV6") erect penis is placed on JV5's anus.]</p> <p>[Sent WILLIAMS an image of JV5 laying on top of JV6. In the image, JV5 is nude with JV5's back and buttocks exposed. JV6's erect penis, testicles, and upper thighs are visible. JV6's erect penis is placed on JV5's anus.]</p> <p>[Sent WILLIAMS an image of JV5 performing oral sex on JV6. In the image, JV5 is holding JV6's erect penis in JV5's mouth.]</p>

	[Sent WILLIAMS an image of JV5 holding JV6's erect penis. In the image, JV5's face and torso are exposed. JV6 is lying on JV6's back with JV6's stomach, penis, and upper thighs exposed.]
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90. On November 19, 2023, WILLIAMS sent JV5 \$30.00 via PayPal account number 1687746496956931697.

91. Investigation led to the identification of JV6 as JV5's prior boyfriend. JV6 is currently eighteen years old but was sixteen to seventeen at the time of the communications.

92. In a CAF Interview on August 1, 2024, JV5 provided the following information:

- a. JV5 met WILLIAMS on Snapchat when JV5 was approximately fifteen years old. After talking for a while, WILLIAMS offered to pay JV5 for sexually explicit images and videos of JV5. WILLIAMS requested images and videos depicting specific content.
- b. JV5 sent WILLIAMS sexually explicit images and videos via Snapchat in exchange for payments on Cash App. Sometimes WILLIAMS paid JV5 up front. JV5 would then produce the content and send it to WILLIAMS immediately after.
- c. WILLIAMS also sent JV5 explicit images and videos of himself that included his penis.

- d. JV5 confirmed that the series of messages between Snapchat username “dforester2” and Snapchat username “tsw0708” recovered from WILLIAMS’s Snapchat account were conversations between JV5 and WILLIAMS.
- e. JV5 confirmed JV5’s identity in a representative sample of the media recovered from WILLIAM’s Snapchat account that was sent from JV5 to WILLIAMS. JV5 admitted to creating and sending additional, similar media of himself to WILLIAMS via Snapchat.
- f. JV5 confirmed JV5 and JV6’s identity in the images showing JV5 and JV6 engaged in oral sex and other sexual activity, and confirmed that JV5 sold the media to WILLIAMS.

93. In an interview on August 1, 2024, JV6 provided the following information:

- a. JV6 identified himself in the images of JV5 and JV6 engaged in oral sex and other sexual activity. JV6 was sixteen years old at the time the images were produced. The images were produced at JV6’s residence in Ohio.
- b. JV6 was JV5’s boyfriend at the time JV5 produced the images. JV6 and JV5 are no longer together.
- c. JV6 was aware JV5 sold the media online to WILLIAMS.

d. JV6 has never had any contact with WILLIAMS.

94. The following messages recovered from WILLIAMS's Snapchat account corroborate JV5's statements.

February 17, 2023	
WILLIAMS	Are you somewhere you can do some nice photos? I'll send you \$20 for those
JV5	How many pic??
WILLIAMS	How about 10? Some front some back full body. I just love seeing your amazing body
JV5	Ok lmk when you send it
JV5	<p>[Sent WILLIAMS a nude image of JV5. In the image, JV5 is standing with JV5's torso, penis, and testicles exposed.]</p> <p>[Sent WILLIAMS a video of JV5 displaying JV5's nude body. In the video, JV5 is standing with JV5's face, torso, penis, testicles, and buttocks are visible throughout the video.]</p> <p>[Sent WILLIAMS an image of JV5 holding JV5's penis. In the image, JV5 is standing with shorts pulled down around JV1's ankles to expose JV5's torso, penis, testicles, and legs.]</p> <p>[Sent WILLIAMS a nude image of JV5. In the video, JV5's torso, penis, testicles, and legs are exposed.]</p> <p>[Sent WILLIAMS a nude image of JV5. In the image, JV5's torso, penis, testicles, and legs are visible. JV5 is wearing shorts pulled down around JV5's ankles.]</p> <p>[Sent WILLIAMS a 1-second video of JV5 displaying JV5's nude body. In the video, JV5's torso, penis, testicles, and buttocks are visible throughout.]</p>

	<p>[Sent WILLIAMS a nude image of JV5. In the image, JV5's torso, penis, testicles, and legs are visible.]</p> <p>[Sent WILLIAMS an image of JV5 holding JV5's buttocks open to expose JV5's anus and testicles.]</p> <p>[Sent WILLIAMS a nude image of JV5. In the image, JV5 is standing with JV5's torso, penis, testicles, and upper thighs exposed.]</p>
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95. On February 17, 2023, WILLIAMS sent JV5 \$30.00 via Cash App account \$Todwilli.

September 16, 2023	
WILLIAMS	Do you have any body pics that can go with the videos babe? I miss your beautiful body
JV5	Yea I have a couple but they aren't the best
WILLIAMS	Babe anything from you is the best
JV5	Okay
JV5	Just lmk when your ready
WILLIAMS	I had to run some errands but I'm back now and I'll send it now babe
JV5	Okay baby do you want me to send it now too?
JV5	<p>[Sent a 14-second video of JV5 masturbating. In the video, JV5 is seated in a red-and-black office chair wearing a black, long-sleeved shirt. JV5's erect penis, testicles, and upper thighs are exposed.]</p> <p>[Sent WILLIAMS an image of JV5 holding JV5's erect penis. In the image, JV5 is seated in a chair, and JV5's penis, testicles, and upper thighs are visible.]</p>

	<p>[Sent WILLIAMS a 20-second video of JV5 masturbating. In the video, JV5 is seated in chair, and JV5's penis, testicles, and upper thighs are visible.]</p> <p>[Sent WILLIAMS an image of JV5 holding JV5's erect penis. In the image, JV5 is seated in chair, and JV5's penis, testicles, and upper thighs are visible.]</p> <p>[Sent WILLIAMS a 27-second video of JV5 masturbating. In the video, JV5 is seated in a chair, and JV5's penis, testicles, and upper thighs are visible.]</p> <p>[Sent WILLIAMS an image of JV5 holding JV5's erect penis. In the image, JV5 is seated in a chair, and JV5's penis, testicles, and upper thighs are visible.]</p> <p>[Sent WILLIAMS an 8-second video of JV5 masturbating in an outdoor shower. In the video, the lower portion of JV5's face is captured from 00:00–00:04. JV5's torso, penis, testicles, and legs are exposed.]</p> <p>[Sent WILLIAMS an image of JV5 holding JV5's erect penis. In the image, the lower half of JV5's face, torso, penis, testicles, and legs are visible.]</p> <p>[Sent WILLIAMS a 9-second video of JV5 masturbating in an outdoor shower. In the video, JV5's face, torso, penis and testicles are visible.]</p> <p>[Sent WILLIAMS an image of JV5 standing in an outdoor shower holding JV5's erect penis. In the image, JV5's face, torso, penis, and testicles are exposed.]</p>
WILLIAMS	G babe so perfect and beautiful

96. On September 16, 2023, WILLIAMS sent JV5 \$30.00 via PayPal account number 1687746496956931697.

May 21, 2023	
WILLIAMS	[Sent JV5 an image of a white adult male's erect penis. A blue velour blanket, white sports jersey material, and two white framed windows with white blinds drawn are visible in the background.]

97. Between November 30, 2022, and January 2, 2024, JV5 sent WILLIAMS, via Snapchat, 366 images and 157 videos containing child pornography of JV5 or of JV5 and JV6. Between November 30, 2022, and December 19, 2023, WILLIAMS sent JV5 \$3,339.00 in ninety-nine payments ranging from \$8.00 to \$150.00 via multiple Cash App and PayPal accounts subscribed to by WILLIAMS.

ADDITIONAL BACKGROUND

98. Computer/smartphone technology has revolutionized the way in which individuals interested in child pornography interact with each other. Child pornography was historically produced using cameras and film (either still photography or movies). The photographs required darkroom facilities and a significant amount of skill in order to develop and reproduce the images. There were definable costs involved with the production of pornographic images. To distribute these on any scale required significant resources. The photographs themselves were somewhat bulky and required secure storage to prevent their exposure to the public. The distribution of these wares was accomplished through

a combination of personal contacts, mailings, and telephone calls. The development of computers/smartphones has changed this. Computers/smartphones basically serve four functions in connection with child pornography: production, communication, distribution, and storage.

99. Child pornography offenders can now transfer photographs onto a computer readable format with a scanner. With the advent of digital cameras/smartphones, the images can now be transferred directly onto a computer. Modems allow any computer to connect to another computer through the use of telephone, cable, or wireless connection. Electronic contact can be made to literally millions of computers around the world.

100. The computer/smartphone ability to store images in digital form makes the computer itself an ideal repository for child pornography. The size of the electronic storage media (commonly referred to as the hard drive) used in home computers has grown tremendously within the last several years. These drives can store thousands of images at very high resolution.

101. The Internet affords collectors of child pornography several different venues for obtaining, viewing, and trading child pornography in a relatively secure and anonymous fashion.

102. Collectors and distributors of child pornography also use online resources to retrieve and store child pornography. These online services allow a

user to set up an account with a remote computing service that provides email services as well as electronic storage of computer files in any variety of formats. A user can set up an online storage account from nearly any computer with access to the Internet. Evidence of such online storage of child pornography is often found on the user's computer. Even in cases where online storage is used, however, evidence of child pornography can still be found on the user's computer in most cases.

103. Digital files such as movies and pictures can be quickly and easily transferred back and forth between computers, smartphones, and other devices or stored simultaneously on multiple devices. Collectors of child pornography often keep their child pornography in multiple places, including on multiple devices.

104. As is the case with most digital technology, communications by way of computer can be saved or stored on the computer used for these purposes. Storing this information can be intentional (e.g., by saving an email as a file on the computer or saving the location of one's favorite websites in, for example, "bookmarked" files). Digital information can also be retained unintentionally (e.g., traces of the path of an electronic communication may be automatically stored in many places, such as in temporary files or ISP client software, among others). In addition to electronic communications, a computer user's Internet activities generally leave traces or "footprints" and history files of the browser

used. A forensic examiner often can recover evidence suggesting whether a computer contains such information because such information is often maintained indefinitely until overwritten by other data.

ADDITIONAL INFORMATION AND/OR CHARACTERISTICS

105. Based on my previous investigative experience related to child exploitation investigations, and the training and experience of other law enforcement officers with whom I have had discussions, I know there are certain characteristics common to individuals who solicit and distribute child pornography.

a. Such individuals may receive sexual gratification, stimulation, and satisfaction from contact with minors, or from fantasies they may have viewing minors engaged in sexual activity or in sexually suggestive poses, such as in person, in photographs, or other visual media, or from literature describing such activity.

b. Such individuals may collect sexually explicit or suggestive materials in a variety of media, including photographs, magazines, motion pictures, videotapes, books, slides and/or drawings or other visual media. Individuals who have a sexual interest in children or images of children oftentimes use these materials for their own sexual arousal and gratification. Further, they may use these materials to lower the inhibitions of children they are

attempting to seduce, to arouse the selected child partner, or to demonstrate the desired sexual acts.

c. Such individuals almost always possess and maintain any hard copies of child pornographic material (i.e., pictures, films, video tapes, magazines, negatives, photographs, correspondence, mailing lists, books, tape recordings, etc.) in the privacy and security of their home or some other secure location. Individuals who have a sexual interest in children or images of children typically retain pictures, films, photographs, negatives, magazines, correspondence, books, tape recordings, mailing lists, child erotica, and videotapes for many years.

d. Likewise, such individuals, including those who create and/or produce child pornographic images, often maintain their child pornography images in a digital or electronic format in a safe, secure, and private environment, such as a computer and surrounding area. These child pornography images are often maintained for several years and are kept close by, usually at the possessor's residence, inside the possessor's vehicle, or, at times, on their person, to enable the individual to view the child pornography images, which are valued highly. Some of these individuals also have been found to download, view, and then delete child pornography on their computers or digital devices on a cyclical and repetitive basis.

e. Importantly, evidence of such activity, including deleted child pornography, often can be located on these individuals' computers and digital devices through the use of forensic tools. Indeed, the very nature of electronic storage means that evidence of the crime is often still discoverable for extended periods of time even after the individual "deleted" it.

f. Such individuals also may correspond with and/or meet others to share information and materials; rarely destroy correspondence from other child pornography distributors/possessors; conceal such correspondence as they do their sexually explicit material, and often maintain lists of names, addresses; and telephone numbers of individuals with whom they have been in contact and who share the same interests in child pornography.

g. Such individuals prefer not to be without their child pornography for any prolonged time period. This behavior has been documented by law enforcement officers involved in the investigation of child pornography throughout the world. Thus, even if someone uses a portable device (such as a mobile phone) to access the Internet and child pornography, it is more likely than not that evidence of this access will be found in their home.

COMPUTERS, ELECTRONIC STORAGE, AND FORENSIC ANALYSIS

106. Your affiant is seeking records relating to violations of 18 U.S.C.

§ 2251. One form in which the records are likely to be found is data stored on a computer's hard drive or other storage media.

107. *Probable cause.* I submit that if a computer or storage medium is found during the execution of the search warrants mentioned above, there is probable cause to believe those records referenced above will be stored on that computer or storage medium, for at least the following reasons:

- a. Based on my knowledge, training, and experience, I know that computer files or remnants of such files can be recovered months or even years after they have been downloaded onto a storage medium, deleted, or viewed via the Internet. Electronic files downloaded to a storage medium can be stored for years at little or no cost. Even when files have been deleted, they can be recovered months or years later using forensic tools. This is so because when a person "deletes" a file on a computer, the data contained in the file usually does not actually disappear; rather, that data remains on the storage medium until it is overwritten by new data.
- b. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space—that is, in space on the storage medium that

is not currently being used by an active file—for long periods of time before they are overwritten. In addition, a computer's operating system may also keep a record of deleted data in a "swap" or "recovery" file.

- c. Wholly apart from user-generated files, computer storage media—in particular, computers' internal hard drives—contain electronic evidence of how a computer has been used, what it has been used for, and who has used it. To give a few examples, this forensic evidence can take the form of operating system configurations, artifacts from operating system or application operation, file system data structures, and virtual memory "swap" or paging files. Computer users typically do not erase or delete this evidence, because special software is typically required for that task. However, it is technically possible to delete this information.
- d. Similarly, files that have been viewed via the Internet are sometimes automatically downloaded into a temporary Internet directory or "cache."

108. *Forensic evidence.* Your affiant seeks to locate not only computer files that might serve as direct evidence of the crimes described above, but also for forensic electronic evidence that establishes how computers were used, the purpose

of their use, who used them, and when. There is probable cause to believe that this forensic electronic evidence will be on any storage medium in 1010 Old Stage Road, Chilhowie, VA 24319 and/or on the person of WILLIAMS because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave traces of information on the storage medium that show what tasks and processes were recently active. Web browsers, email programs, and chat programs store configuration information on the storage medium that can reveal information such as online nicknames and passwords. Operating systems can record additional information, such as the attachment of peripherals, the attachment of USB flash storage devices or other external storage media, and the times the computer was in use. Computer file systems can record information about the dates files were created and the sequence in which they were created, although this information can later be falsified.
- b. As explained herein, information stored within a computer and other electronic storage media may provide crucial evidence of the “who, what, why, when, where, and how” of the criminal conduct under

investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, information stored within a computer or storage media (e.g., registry information, communications, images and movies, transactional information, records of session times and durations, Internet history, and antivirus, spyware, and malware detection programs) can indicate who has used or controlled the computer or storage media. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. The existence or absence of antivirus, spyware, and malware detection programs may indicate whether the computer was remotely accessed, thus inculpatory or exculpatory the computer owner. Further, computer and storage media activity can indicate how and when the computer or storage media was accessed or used. For example, computers typically contain information that logs: computer user account session times and durations, computer activity associated with user accounts, electronic storage media that connected with the computer, and the IP addresses through which the computer accessed networks and the Internet. Such information allows investigators to understand the

chronological context of computer or electronic storage media access, use, and events relating to the crime under investigation.

Additionally, some information stored within a computer or electronic storage media may provide crucial evidence relating to the physical location of other evidence and the suspect. For example, images stored on a computer may both show a particular location and have geolocation information incorporated into its file data. Such file data typically also contains information indicating when the file or image was created. The existence of such image files, along with external device connection logs, may also indicate the presence of additional electronic storage media (e.g., a digital camera or cellular phone with an incorporated camera). The geographic and timeline information described herein may either inculcate or exculpate the computer user. Last, information stored within a computer may provide relevant insight into the computer user's state of mind as it relates to the offense under investigation. For example, information within the computer may indicate the owner's motive and intent to commit a crime (e.g., Internet searches indicating criminal planning), or consciousness of guilt (e.g., running a "wiping" program to destroy

evidence on the computer or password protecting/encrypting such evidence in an effort to conceal it from law enforcement).

- c. A person with appropriate familiarity with how a computer works can, after examining this forensic evidence in its proper context, draw conclusions about how computers were used, the purpose of their use, who used them, and when.
- d. The process of identifying the exact files, blocks, registry entries, logs, or other forms of forensic evidence on a storage medium that are necessary to draw an accurate conclusion is a dynamic process. While it is possible to specify in advance the records to be sought, computer evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.
- e. Further, in finding evidence of how a computer was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium. For example, the presence or absence of counter-forensic programs or

anti-virus programs (and associated data) may be relevant to establishing the user's intent.

- f. I know that when an individual uses a computer to obtain or access child pornography, the individual's computer will generally serve both as an instrumentality for committing the crime, and also as a storage medium for evidence of the crime. The computer is an instrumentality of the crime because it is used as a means of committing the criminal offense. The computer is also likely to be a storage medium for evidence of crime. From my training and experience, I believe that a computer used to commit a crime of this type may contain data that is evidence of how the computer was used; data that was sent or received; notes as to how the criminal conduct was achieved; records of Internet discussions about the crime; and other records that indicate the nature of the offense.

109. I know that a majority of households in the United States have access to a personal computing device of one type or another. In light of this fact, I believe that records associated with illegal conduct are likely to be found on digital devices, including "smartphones." Thus, I have requested permission to search digital devices that are found at the 1010 Old Stage Road, Chilhowie, VA 24319 and/or on the person of WILLIAMS.

110. Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrants I am applying for would permit seizing, imaging, or otherwise copying storage media that reasonably appear to contain some or all of the evidence described in the warrants, and would authorize a later review of the media or information consistent with the warrant.

BIOMETRIC ACCESS TO DEVICE(S)

111. This warrant would permit law enforcement agents to obtain from the person of TODD STEWART WILLIAMS (but not any other individuals present at the time of execution of the warrant) the compelled display of any physical biometric characteristics (such as fingerprint/thumbprint or facial characteristics) necessary to unlock any device(s) requiring such biometric access (and subject to seizure pursuant to a separate warrant) for which law enforcement has reasonable suspicion that the aforementioned person(s)' physical biometric characteristics will unlock the device(s). The grounds for this request are as follows:

112. I know from my training and experience, as well as from information found in publicly available materials published by device manufacturers, that many electronic devices, particularly newer mobile devices, tablets, and laptops, offer their users the ability to unlock the device through biometric features in lieu of a numeric or alphanumeric passcode or password. These biometric features include fingerprint scanners, facial recognition features, and iris recognition features. Some devices

offer a combination of these biometric features, and the user of such devices can select which features they would like to utilize.

113. If a device is equipped with a fingerprint scanner, a user may enable the ability to unlock the device through his or her fingerprints. For example, Apple offers a feature called “Touch ID,” which allows a user to register fingerprints that can unlock a device. Once a fingerprint is registered, a user can unlock the device by pressing the relevant finger to the device’s Touch ID sensor, which is found in the round button (often referred to as the “home” button) located at the bottom center of the front of the device. The fingerprint sensors found on devices produced by other manufacturers have different names but operate similarly to Touch ID.

114. If a device is equipped with a facial-recognition feature, a user may enable the ability to unlock the device through his or her face. For example, this feature is available on certain Android devices and is called “Trusted Face.” During the Trusted Face registration process, the user holds the device in front of his or her face. The device’s front-facing camera then analyzes and records data based on the user’s facial characteristics. The device can then be unlocked if the front-facing camera detects a face with characteristics that match those of the registered face. Facial recognition features found on devices produced by other manufacturers (such as Apple’s “Face ID”) have different names but operate similarly to Trusted Face.

115. If a device is equipped with an iris-recognition feature, a user may enable the ability to unlock the device with his or her irises. For example, on certain Microsoft devices, this feature is called "Windows Hello." During the Windows Hello registration, a user registers his or her irises by holding the device in front of his or her face. The device then directs an infrared light toward the user's face and activates an infrared-sensitive camera to record data based on patterns within the user's irises. The device can then be unlocked if the infrared-sensitive camera detects the registered irises. Iris-recognition features found on devices produced by other manufacturers have different names but operate similarly to Windows Hello.

116. In my training and experience, users of electronic devices often enable the aforementioned biometric features because they are considered to be a more convenient way to unlock a device than by entering a numeric or alphanumeric passcode or password. Moreover, in some instances, biometric features are considered to be a more secure way to protect a device's contents. This is particularly true when the users of a device are engaged in criminal activities and thus have a heightened concern about securing the contents of a device.

117. As discussed in this affidavit, your affiant has reason to believe that one or more digital devices will be found during a separate search of 1010 Old Stage Road, Chilhowie, VA 24319 and/or the person of WILLIAMS. The passcode or password that would unlock the device(s) subject to search under this warrant

currently is not known to law enforcement. Thus, law enforcement personnel may not otherwise be able to access the data contained within the device(s), making the use of biometric features necessary to the execution of the search authorized by this warrant.

118. I also know from my training and experience, as well as from information found in publicly available materials including those published by device manufacturers, that biometric features will not unlock a device in some circumstances even if such features are enabled. This can occur when a device has been restarted, inactive, or has not been unlocked for a certain period of time. Thus, in the event law enforcement personnel encounter a locked device equipped with biometric features, the opportunity to unlock the device through a biometric feature may exist for only a short time.

119. Due to the foregoing, if law enforcement personnel encounter any device(s) that are subject to seizure pursuant to a separate warrant and may be unlocked using one of the aforementioned biometric features, this warrant permits law enforcement personnel to obtain from the aforementioned person the display of any physical biometric characteristics (such as fingerprint/thumbprint or facial characteristics) necessary to unlock any device(s), including to (1) press or swipe the fingers (including thumbs) of the aforementioned person to the fingerprint scanner of the device(s) found at 1010 Old Stage Road, Chilhowie, VA 24319 and/or

on the person of WILLIAMS; (2) hold the device(s) found at 1010 Old Stage Road, Chilhowie, VA 24319 and/or on the person of WILLIAMS in front of the face of the aforementioned person to activate the facial recognition feature; and/or (3) hold the device(s) found at 1010 Old Stage Road, Chilhowie, VA 24319 and/or on the person of WILLIAMS in front of the face of the aforementioned person(s) to activate the iris recognition feature, for the purpose of attempting to unlock the device(s) in order to search the contents as authorized by this warrant.

120. The proposed warrant does not authorize law enforcement to require that the aforementioned person state or otherwise provide the password, or identify specific biometric characteristics (including the unique finger(s) or other physical features) that may be used to unlock or access the device(s). Nor does the proposed warrant authorize law enforcement to use the fact that the warrant allows law enforcement to obtain the display of any biometric characteristics to compel the aforementioned person to state or otherwise provide that information. However, the voluntary disclosure of such information by the aforementioned person would be permitted under the proposed warrant. To avoid confusion on that point, if agents in executing the warrant ask any of the aforementioned person for the password to any device(s), or to identify which biometric characteristic (including the unique finger(s) or other physical features) unlocks any device(s), the agents will not state or otherwise imply that the warrant requires the person to provide such information,

and will make clear that providing any such information is voluntary and that the person is free to refuse the request.

CONCLUSION

121. Based on the forgoing, I respectfully request that the Court issue the proposed search warrant as there is probable cause to believe that the federal criminal statute cited herein has been violated, and that the evidence of these offenses will be found on electronic devices during the execution of separate, related warrants. I respectfully request that this Court issue a search warrant authorizing law enforcement to obtain from WILLIAMS the display of physical biometric characteristics (such as fingerprint, thumbprint, or facial characteristics) in order to unlock devices subject to search and seizure pursuant to such related warrants.

REQUEST FOR SEALING

122. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application. I believe that sealing these documents is necessary because the information in these documents is relevant to an ongoing investigation. Based upon my training and experience, I have learned that online criminals actively search for criminal affidavits and search warrants via the Internet and disseminate them to other online criminals as they deem appropriate, i.e., post them publicly online. Premature

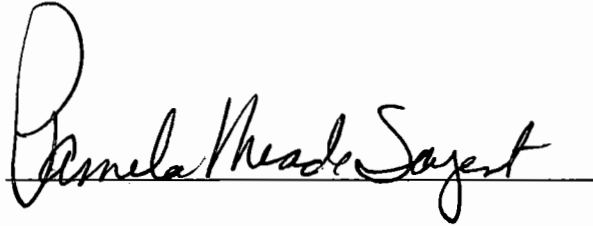
disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.



Lindsey Rosson, Special Agent
Federal Bureau of Investigation
United States Department of Justice

telephonically

Sworn to and subscribed to me this 16th day of August, 2024.



Hon. Pamela Meade Sargent
UNITED STATES MAGISTRATE JUDGE

Reviewed by: Whit Pierce, AUSA

ATTACHMENT A

The person to be searched is TODD STEWART WILLIAMS, date of birth February 7, 1971, Social Security number 412-33-6916.

ATTACHMENT B

Property to be Seized

The compelled display of any physical biometric characteristics (such as fingerprint/thumbprint, facial characteristics, or iris display) necessary to unlock any Device(s) requiring such biometric access subject to seizure pursuant to a separate warrant for which law enforcement has reasonable suspicion that the aforementioned person(s)' physical biometric characteristics will unlock the Device(s), to include pressing fingers or thumbs against and/or putting a face before the sensor, or any other security feature requiring biometric recognition of:

- (a) any of the Device(s) found at 1010 Old Stage Road, Chilhowie, VA 24319 or on the person of TODD STEWART WILLIAMS,
- (b) where the Device(s) are limited to those which are capable of containing and reasonably could contain fruits, evidence, information, contraband, or instrumentalities of the offense(s) as described in the search warrant affidavit and warrant attachments,

for the purpose of attempting to unlock the Device(s)'s security features in order to search the contents as authorized by a separate warrant.

While attempting to unlock the device by use of the compelled display of biometric characteristics pursuant to this warrant, law enforcement is not authorized

to demand that the aforementioned person(s) state or otherwise provide the password or identify the specific biometric characteristics (including the unique finger(s) or other physical features), that may be used to unlock or access the Device(s). Nor does the warrant authorize law enforcement to use the fact that the warrant allows law enforcement to obtain the display of any biometric characteristics to compel the aforementioned person(s) to state or otherwise provide that information. However, the voluntary disclosure of such information by the aforementioned person(s) is permitted. To avoid confusion on that point, if agents in executing the warrant ask any of the aforementioned person(s) for the password to any Device(s), or to identify which biometric characteristic (including the unique finger(s) or other physical features) unlocks any Device(s), the agents will not state or otherwise imply that the warrant requires the person to provide such information, and will make clear that providing any such information is voluntary and that the person is free to refuse the request.